

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA**

<p>JOHN DOE c/o Laffey, Bucci &amp; Kent 1100 Ludlow Street, Suite 300 Philadelphia, PA 19107</p> <p>Plaintiffs, v.  WILLIAMSPORT AREA SCHOOL DISTRICT, LYCOMING COUNTY, DR. BRANDON PARDOE, ROGER FREED, SEAN McCANN, RYAN MILLER, FRED A. HOLLAND, ESQ., WILLIAM WEBER, in his individual and official capacity, and JOHN and JANE DOEs #1-#20 (fictitious names), whose true identities are currently unknown to Plaintiffs,</p> <p>Defendants.</p>	<p><b>CIVIL ACTION NO.</b> <b>4:22-CV-01387-MWB</b></p> <p><b>NOTICE OF VOLUNTARY DISMISSAL</b></p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------

**NOTICE OF VOLUNTARY DISMISSAL OF ACTION**

1. PLEASE TAKE NOTICE, pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, Plaintiff John Doe hereby voluntarily dismisses any and all claims, without prejudice, as against Dr. Brandon Pardoe, Defendant.
2. The dismissal will not prejudice or operate to the detriment of the Defendants named herein.
3. None of the named Defendants have filed or served an answer or a motion for summary judgement.

4. The undersigned hereby certifies that no compensation in any form has passed directly or indirectly from any of the Defendants to the Plaintiff or Plaintiff's attorneys and that no promise to give any such compensation has been made.

WHEREFORE, Plaintiff, John Doe, respectfully prays that the court enter its order granting voluntary dismissal of this action against Defendant Dr. Brandon Pardoe without prejudice.

Dated: 6/1/23

**LAFFEY, BUCCI & KENT, LLP**

BY:



\_\_\_\_\_  
Brian D. Kent, Esq.  
Gaetano D'Andrea, Esq.  
Michael J. McFarland, Esq.  
Jillian P. Roth, Esq.  
LAFFEY, BUCCI & KENT, LLP  
1100 Ludlow Street, Suite 300  
Philadelphia, PA 19107  
(T): (215) 399-9255  
(E): [bkent@lbk-law.com](mailto:bkent@lbk-law.com)  
[gdandrea@lbk-law.com](mailto:gdandrea@lbk-law.com)  
[mmcfarland@lbk-law.com](mailto:mmcfarland@lbk-law.com)  
[jroth@lbk-law.com](mailto:jroth@lbk-law.com)

**STAPP LAW, LLC**

BY:

/s/ Gregory A. Stapp  
\_\_\_\_\_  
Gregory A. Stapp, Esq.  
STAPP LAW, LLC  
153 West 4th Street, Suite 6  
Williamsport, PA 17701  
(T): (570) 326-1077  
(570) 651-9420  
(E): [gstapp@stapplaw.net](mailto:gstapp@stapplaw.net)

*Attorneys for Plaintiff*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of this document via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure as follows:

Joseph D. Shelby, Esquire  
Cipriani & Werner, P.C.  
45 E. Orange Street  
Lancaster, PA 17601  
[JShelby@c-wlaw.com](mailto:JShelby@c-wlaw.com)  
*Attorney for Defendant Fred A. Holland, Esq.*

Frank J. Lavery, Jr., Esquire  
Andrew W. Norfleet, Esquire  
Lavery Law  
P.O. Box 1245  
Harrisburg, PA 17108-1245  
[flavery@laverylaw.com](mailto:flavery@laverylaw.com)  
[anorfleet@laverylaw.com](mailto:anorfleet@laverylaw.com)  
*Attorneys for Defendant Lycoming County*

Gary H. Dadamo, Esquire  
Jason P. Sam, Esquire  
Sweet, Stevens, Katz & Williams LLP  
331 E. Butler Avenue  
P.O. Box 5069  
New Britain, PA 18901  
[gdadamo@sweetstevens.com](mailto:gdadamo@sweetstevens.com)  
[jsam@sweetstevens.com](mailto:jsam@sweetstevens.com)  
*Attorneys for Defendants WASD,  
Dr. Brandon Pardoe, Sean McCann,  
and Ryan Miller*

Date: 6/1/2023

Gregory W. Bair, II, Esq.  
Stock and Leader  
221 West Philadelphia St.  
York, PA 17401  
[gbair@stockandleader.com](mailto:gbair@stockandleader.com)  
*Attorney for Defendant Roger Freed*

Donald L. Carmelite, Esquire  
Yael L. Dadoun, Esquire  
Marshall, Dennehey, Warner,  
Coleman & Goggin, P.C.  
100 Corporate Center Dr., Suite 201  
Camp Hill, PA 17011  
[lcarmelite@mdwcg.com](mailto:lcarmelite@mdwcg.com)  
[yldadoun@mdwcg.com](mailto:yldadoun@mdwcg.com)  
*Attorneys for Defendant William Weber*

**LAFFEY, BUCCI & KENT, LLP**  
By: /s/ Brian D. Kent, Esquire  
Attorney ID No. 94221  
Brian D. Kent, Esquire  
1100 Ludlow Street, Suite 300  
Philadelphia, PA 19107  
(215) 399-9256  
[bkent@lbk-law.com](mailto:bkent@lbk-law.com)